

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

THIS DOCUMENT RELATES TO:

| | | |
|-------------------------------------|---|------------------------|
| ----- | X | |
| | : | |
| PRECISION ASSOCIATES, INC., et al., | : | |
| | : | |
| Plaintiffs, | : | |
| v. | : | 08-CV-00042 (JG) (VVP) |
| | : | |
| PANALPINA WORLD TRANSPORT | : | |
| (HOLDING) LTD., et al., | : | |
| | : | |
| Defendants. | : | |
| ----- | X | |

**GEODIS DEFENDANTS' NOTICE OF MOTION TO DISMISS
PLAINTIFFS' FIRST AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE THAT the Defendants Geodis S.A. and Geodis Wilson USA (collectively "Geodis Defendants"), Inc. will move this Court before the Honorable John Gleeson, United States District Judge, at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on a date and at a time to be determined by the Court, for an order dismissing the First Amended Class Action Complaint as to Geodis S.A. pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(4) and 12(b)(6); dismissing the First Amended Class Action Complaint as to Geodis Wilson USA, Inc., pursuant to Federal Rule of Civil Procedure 12(b)(6); and for such other and further relief as the Court may deem just.

PLEASE TAKE FURTHER NOTICE THAT Geodis S.A. and Geodis Wilson USA, Inc. shall rely on Geodis Defendants' Memorandum of Law in Support of Their Motion to Dismiss and the accompanying Declaration of Stéphane Cassagne, and all other pleadings, papers and proceedings in this case.

DATED: September 1, 2010

HAUSFELD LLP

By: /s/ Steig D. Olson

Steig D. Olson

11 Broadway, Suite 615

New York, NY 10004

Telephone: (212) 830-9850

Facsimile: (212) 480-8560

E-mail: solson@hausfeldllp.com

Michael D. Hausfeld

Andrew B. Bullion

Brian A. Ratner

Jeannine M. Kenney

1700 K Street NW, Suite 650

Washington, DC 20006

Telephone: (202) 540-7200

Facsimile: (202) 540-7201

E-mail: mhausfeld@hausfeldllp.com

abullion@hausfeldllp.com

bratner@hausfeldllp.com

jkenney@hausfeldllp.com

Counsel for Defendants

Geodis S.A. and Geodis Wilson USA, Inc.